

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Proposed Amendments to the Service Rules)	PS Docket No. 13-87
Governing Public Safety Narrowband Operations in)	
the 769-775/799-805 MHz Bands)	
)	
National Public Safety Telecommunications)	RM-11433
Council Petition for Rulemaking on Aircraft Voice)	
Operations at 700 MHz)	
)	
National Public Safety Telecommunications)	RM-11433
Council Petition for Rulemaking to Revise 700)	
MHz Narrowband Channel Plan)	
)	
Region 24 700 MHz Regional Planning Committee)	WT Docket No. 96-86
Petition for Rulemaking)	PS Docket No. 06-229
)	
State of Louisiana Petition for Rulemaking)	RM-11577

REPLY COMMENTS OF THE PROJECT 25 COMPLIANCE ASSESSMENT PROGRAM ADVISORY PANEL¹

The Project 25 (P25) Compliance Assessment Program Advisory Panel (CAP AP) submits the following reply comments in response to the Commission's Notice of Proposed Rulemaking (Notice) in the above-captioned proceedings.²

The P25 CAP AP is an advisory panel formed by the Department of Homeland Security (DHS) Office of Interoperability and Compatibility (OIC) within the Science and Technology Directorate of the US Department of Homeland Security to help establish standards among digital two-way land mobile radio communications products. The CAP AP oversees the P25 CAP program and makes recommendations to DHS OIC to promote the P25 standard in communications equipment within the public safety community.

¹ The FCC member of the P25 Compliance Assessment Program Advisory Panel did not participate in Panel deliberations or otherwise with respect to these viewpoints or comments filed with the Commission.

² Proposed Amendments to the Service Rules Governing Public Safety Narrowband Operations in the 769-775/799-805 MHz Bands, Order on Reconsideration and Further Notice of Proposed Rulemaking, FCC 16-111 (rel. Aug. 22, 2016) (Notice).

The P25 CAP program tests communications equipment that claims to be compliant with P25 standards to ensure the equipment can work together regardless of supplier. The P25 CAP is a voluntary program that allows suppliers to formally demonstrate their products' compliance with P25 standards. Compliance testing is a formal, independent process that concludes with official summary test reports and suppliers' declaration of compliance document being published by DHS OIC on the www.dhs.gov/science-and-technology/p25-cap website.

The CAP AP will provide DHS OIC with federal, state, local, tribal and territorial perspectives on portable, handheld, and vehicle mounted radios and infrastructure equipment. Through the P25 CAP AP, OIC can support the collective interest of public safety organizations that procure and implement P25 compliant equipment.

P25 CAP Advisory Panel Comments

The P25 CAP AP originally submitted the set of 15 feature set and capabilities to the Commission³ in response to requests that the P25 CAP AP recommend features sets and capabilities for the 700 MHz Interoperability channels⁴. The Commission took those inputs from the P25 CAP AP and included them in the FCC-16-111 FNPRM, Appendix C.

In the October 2016 P25 CAP AP comment filing⁵ for FCC-16-111, the P25 CAP AP retracted 8 of the 15 features that were originally submitted. Plus, the CAP AP provided recommended replacement text for the remaining features. This action by the CAP AP was based on feedback the CAP AP received from Public Safety users plus further due diligence by the P25 CAP AP. The CAP AP believes remaining features are the baseline features for the 700 MHz interoperability channels.

³ P25 CAP AP Comments June 22, 2016;

<https://ecfsapi.fcc.gov/file/10622078206701/P25%20CAP%20AP%20Ex%20Parte%20FCC%20Filing%20700%20CAP%20CERT%20FINAL.doc>

⁴ NPSTC Ex Parte November 20, 2015, <https://ecfsapi.fcc.gov/file/60001339632.pdf> ; TIA Ex Parte November 24, 2015, <https://ecfsapi.fcc.gov/file/60001342997.pdf> ;

⁵ "FCC NPRM 700 MHz P25 CAP AP comments October 2016"

<https://ecfsapi.fcc.gov/file/1026263843332/FCC%20NPRM%20700%20MHz%20P25%20CAP%20AP%20comments%20%20October%202016.pdf>

Motorola Solutions Comments

In the Motorola Solutions filed comments ‘Comments of Motorola Solutions, Inc.’ from October 2016⁶, Motorola states under ‘II. Comments to the Further Notice, A. CAP Compliance’, within the second paragraph;

“In addition, Motorola Solutions notes that the CAP compliance program requires testing against products from three different manufacturers to demonstrate interoperability. Application of this requirement threatens to delay the introduction of new products until three other manufacturers produce sufficiently similar technologies, which would be a perverse disincentive to innovation for public safety technologies.”

The P25 CAP Advisory Panel would note that the P25 CAP test cases of the ‘CAP compliance program’ cover well known P25 features that have been shipping into the marketplace for many years. P25 CAP only tests a small subset of the large number of the P25 Standard features. The P25 CAP AP has not been made aware of any documented instances of the P25 CAP testing program delaying the introduction of new P25 standard based technology due to the lack of three P25 manufacturers. As an example, P25 Two-Slot TDMA was a major, relatively new, P25 Standard technology introduced into the marketplace and the P25 CAP had no test cases for P25 Two-Slot TDMA when the technology was introduced. Since there were no P25 CAP test cases for P25 Two-Slot TDMA at that time, P25 Two-Slot TDMA technology was not required to be P25 CAP tested. Therefore, the P25 CAP had no impact on this feature’s introduction into the marketplace. If in the future, a situation does arise where the ‘rule of three’ becomes an issue, the P25 CAP already includes an exception procedure that can be utilized to mitigate this issue.

TIA Comments

In the TIA filed comments ‘Comments of the Telecommunications Industry Association’ from October 2016⁷, TIA states in ‘Section II. TIA Recommendations regarding comments on Appendix C’, 1. Recommendation: Replace (d) with the following:

(d) Transceivers capable of conventional operations on the narrowband interoperability channels listed in §90.531(b)(1) must at a minimum include the following feature sets and capabilities while operating in the conventional mode in order to be validated for compliance with the Project 25 standards.

⁶ “MSI 700 MHz Narrowband Comments October 2016”

<https://ecfsapi.fcc.gov/file/102645398510/MSI%20700%20MHz%20Narrowband%20Comments%20October%202016.pdf>

⁷ “TIA Comments P25 feature set FNPR 10262016”

<https://ecfsapi.fcc.gov/file/10262432009443/TIA%20Comments%20P25%20feature%20set%20FNPR%2010262016.pdf>

In the P25 CAP AP filed comments, the CAP AP submitted the following recommended replacement text for 90.548(d):

(d) Mobile and portable transceivers and repeater transceivers must at a minimum include the following feature sets and capabilities while operating in the conventional mode in order to be validated for compliance with the Project 25 standards.

The P25 CAP AP supports the TIA recommended replacement text for (d) because it is an improvement over the P25 CAP AP replacement text. The TIA text provides direct linkage to the 700 MHz interoperability channels, i.e. 90.531(b)(1), as defined by the Commission.

Summary

P25 CAP AP appreciates the opportunity to define and to help establish a tested, interoperable environment for the 700 MHz interoperability channels.

Respectfully submitted,

Christopher H Wilson, Executive Secretariat

P25 Compliance Assessment Program Advisory Panel

November 10, 2016